**Madam Chair and members of the Committee,** the Humanitarian Organisation for Migration Economics (HOME; www.home.org.sg) welcomes and congratulates the CEDAW Committee for initiating a broad-based and consultative process towards the drafting of the General Recommendation (GR) on Trafficking in Women and Girls in the Context of Global Migration.

HOME, which provides shelter, legal assistance and training for migrant domestic workers (MDWs) in Singapore, notes the vulnerability of MDWs falling prey to trafficking in persons (TIP) situations. We also note that dealing with labour exploitation is a core part of identifying TIP situations and victims. Therefore, we make the following recommendations:

* **National legislation on TIP must be strengthened to be on par with international standards.** Lack of clarity in key terms and significant omissions of important definitions (for e.g. “coercion and “abuse of vulnerability”) in local TIP legislation hinders the identification of trafficking victims. TIP and its associated terms need to be clearly defined so that TIP situations can be investigated in accordance with international standards.
* **States must cover MDWs under its primary labour laws (such as the Employment Act, or its equivalent).** If the key purpose of TIP is exploitation, prevention efforts need to focus on combating exploitation, with clear laws and strong enforcement**.** Excluding MDWs from key labour protections leaves them highly vulnerable to abuse, as their working conditions depend on individual employers and not objective legal standards.
* **Establish the right for MDWs to switch employers freely**. Any dependency on employers for MDWs’ legal and employment status, for example employer-tied regimes like the *kafala* system, often induces exploitative conditions. States should allow MDWs the right to transfer to a new employer, by giving reasonable notice. Similarly, States should abolish security bonds and other types of financial liabilities imposed on employers which incentivises exploitation and restricts freedom.
* **Strengthen cross-border cooperation to regulate working conditions in compliance with international labour standards.** Labour migration is a transnational process, and TIP is a transnational crime. Bilateral agreements must align labour standards between origin and destination countries. Regulatory systems also need to be established to ensure effective cross-border monitoring and management of breaches.
* **Better regulation of recruitment fees and costs:** Currently, MDWs incur exorbitant debts in order to gain overseas placements. During loan repayment periods, employers who are fearful that their live-in MDWs may ‘run away’ may impose restrictions on their freedoms. The GR should call for an eventual move towards a ‘zero fees for workers’ model, based on the ILO Fair Recruitment Initiative. In the interim, greater transparency is necessary; such as providing itemized breakdowns of fees charged.
* **Advocate for States to adopt a rights-based approach for victims of TIP.** MDWs who are identified as potential victims of TIP should be given the full range of protections available under international law. Particularly, they should not be prosecuted for crimes committed while being a TIP victim, be given the right to decent work opportunities, and compensation.
* **Improve transparency of national trafficking referral systems:** Greater transparency in national trafficking referrals systems is needed to ensure that stakeholders who encounter MDWs on a regular basis are able to recognise forced labour and trafficking indicators. Victim identification processes need be benchmarked to international standards and strengthened with the deep involvement of CSOs.
* **Encourage capacity-building programmes for law enforcement officers and other relevant front-line responders**. Frequent training programmes involving labour officials, the police and CSOs are necessary to ensure proper victim identification and cohesive efforts to combat labour exploitation and trafficking.

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